

EXHIBIT 161

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK**

STATES OF NEW YORK,
MASSACHUSETTS,
WASHINGTON, COLORADO,
CONNECTICUT, DELAWARE,
DISTRICT OF COLUMBIA,
HAWAII, ILLINOIS, IOWA, NEW
MEXICO, NORTH CAROLINA,
OREGON, PENNSYLVANIA,
RHODE ISLAND, VERMONT, and
VIRGINIA,

Plaintiffs,

v.

DONALD TRUMP, in his official capacity as President of the United States; U.S. DEPARTMENT OF HOMELAND SECURITY; ELAINE C. DUKE, in her official capacity; U.S. CITIZENSHIP AND IMMIGRATION SERVICES; U.S. IMMIGRATION AND CUSTOMS ENFORCEMENT; and the UNITED STATES OF AMERICA,

CIVIL ACTION NO. 1:17-cv-05228
(NGG) (JO)

Defendants.



Richard M. Locke
Provost
Professor of Political Science and
International and Public Affairs

DECLARATION OF RICHARD M. LOCKE, PROVOST, BROWN UNIVERSITY

My name is Richard M. Locke, and I am professor of political science and international and public affairs at Brown University and currently serve as Provost of Brown.

Brown University takes great pride in cultivating a diverse and inclusive community of highly talented students, faculty and staff who are essential to fulfilling our mission at the highest levels, which is:

To serve the community, the nation, and the world by discovering, communicating, and preserving knowledge and understanding in a spirit of free inquiry, and by educating and preparing students to discharge the offices of life with usefulness and reputation.

The intellectual rigor of our academic community is both enhanced by and dependent upon the contributions of exceptionally promising individuals with different viewpoints, experiences and intellectual pursuits. Having students from diverse races, ethnicities, nationalities, cultural heritages and perspectives is central to our quest to engage in research and teaching that yields solutions to some of the most pressing societal issues that we confront in our increasingly complex world.

Brown University enrolls approximately 9400 students, each with a different personal story, but who share a common goal – to use their substantial intellectual assets and educational experience to make a difference in the world, locally and globally. Although Brown University does not keep centralized records of students who are participating in the Deferred Action for Childhood Arrival (DACA) program, we are aware that there are DACA students in both the undergraduate and graduate programs, including the School of Public Health and Warren Alpert Medical School. We estimate that Brown has approximately 12 students enrolled in DACA.

DACA students contribute a variety of perspectives, knowledge, skills and life experiences to our academic community, and to all educational and social aspects of Brown University. Many of the DACA program students are the first in their families to attend college. These students strengthen and enrich our community, both within and outside the classroom.

The ability to work legally is essential for many DACA students, since they are not eligible for federal financial aid and may need to work to supplement any

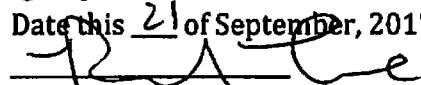
other sources of aid. For those students, the loss of the ability to support themselves or gain valuable experience while studying will jeopardize their opportunities to complete their studies and move into the world of employment.

While it is critical to understand the value and importance the students participating in the DACA program bring to campus life at Brown University, it is just as crucial to understand the consequences of their absence. With the end of DACA, students would be at risk for deportation. This would bring a level of fear and uncertainty to the campus and create a tense, unhealthy environment for our entire community. The discontinuance of DACA would jeopardize the capacity of these individuals to contribute to and take full advantage of their Brown education; significantly reduce the academic and social experience at Brown University for all associated with this distinguished institution; and it would undermine our nation's ability to benefit fully from these smart, skilled and highly capable individuals.

The repeal of the DACA would have a profound adverse impact on the academic and social community at Brown University. Students who, in good faith, pursued this program to enable them to join our community would suddenly be at risk of losing educational, employment and personal opportunities that are possible only if the DACA program is continued.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct to the best of my knowledge.

Date this 21 of September, 2017.


Richard M. Locke, Provost, Brown University